

Federal Communications Commission Washington, D.C. 20554

October 12, 2011

Mr. Mike Simpson Chief, Interoperable Communications Texas Department of Public Safety 5805 North Lamar Boulevard Austin, TX 78752

Re: PS Docket No. 06-229, Request for a PLMN ID

Dear Mr. Simpson,

In your Quarterly Report filed on August 29, 2011, the State of Texas provided notice to the Bureau of its need for a permanent PLMN ID for the public safety broadband network Texas is deploying pursuant to its waiver. In a recent conversation with Bureau staff, Texas indicated its preference that all waiver recipients' networks share the use of a single PLMN ID. To help the Bureau better understand this proposal we request that you respond to the following questions by Friday, October 21, 2011.

- 1. Please confirm Texas' preference for the use of a single PLMN ID for all waiver recipient networks, including Texas. If that is not your preference, what is?
- 2. What is Texas' plan for roaming on to a commercial network when other waiver operators, if they have the same PLMN ID as Texas, may also roam on to the same commercial network? How does this work technically and operationally? Is all necessary equipment and software developed that will allow the use of the same PLMN ID between Texas, the waiver operators and commercial roaming networks?
- 3. What is Texas' plan to ensure interworking (i.e., roaming and interconnectivity among waiver jurisdiction deployments) prior to full migration to a nationwide network? How does this work technically and operationally?
- 4. What is Texas' plan for transition of the Texas network to a nationwide network with a single PLMN ID? Has Texas coordinated such an approach with other waiver jurisdictions? How will this transition of the Texas network into a nationwide network with one PLMN ID affect other network identification codes, such as Tracking Area Codes (TAC), PDN identifiers, eNodeB identifiers, and Mobility Manager Entity

¹ State of Texas Amended Quarterly Report, PS Docket 06-229 (filed Aug. 29, 2011), (Fifth Quarterly Report).

² See City of Seattle Ex Parte Filing, PS Docket 06-229 at 2 (filed Oct. 3, 2011) (Seattle Filing).

Group Identifier (MMEGI), and how will they be managed technically and operationally? What are the cost factors that would be involved?

- 5. If Texas uses a single PLMN ID in common with other waiver jurisdictions and ultimately with a nationwide network, will there by a subsystem of identification of Texas and other jurisdictions? Will such a subsystem use the seventh, eight and perhaps higher order digits of the international mobile subscriber identification in order to identify the jurisdictions? If so, will this limit the number of individual users on the network or in any way impact the ability to support non-public safety users? Since this is not the way that commercial entities use the code, are there other consequences that would impact the operation of the network? If this is not the way Texas and other individual jurisdictions will be identified on the network, what method will be used?
- 6. Based on your Interoperability Showing,³ Texas' *Fifth Quarterly Report*, and recent discussions, we understand that the BIG-NET "Go Live" date is set as August 1, 2012, and that the target completion date to obtain a permanent PLMN ID is February 1, 2012.⁴ Based on your responses above, what actions must be taken to ensure that you meet your deployment scheduled? To the extent that any action is dependent on parties not affiliated with Texas, how can you ensure that any action is done within the deployment timeframe?

We appreciate your time and attention to this matter. If you have any questions about this request, please contact Jennifer Manner, Deputy Bureau Chief and Acting ERIC Director, at 202-418-3619 or jennifer.manner@fcc.gov.

Sincerely,

James Arden Barnett, Jr., Rear Admiral (Ret)
Chief, Public Safety and Homeland Security Bureau

³ State of Texas Revised Interoperability Showing, PS Docket 06-229 (filed Sept. 20, 2011).

⁴ *Id*.